

LAW FIRM OF ELEANOR VALE  
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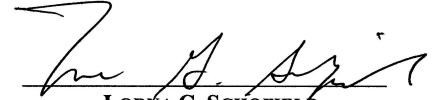
Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Dated: September 7, 2021  
New York, New York

Plaintiff's motion to remand the case to New York state court is DENIED for failure to comply with Individual Rule III.A.3. Pursuant to Individual Rule III.A.3, by **September 10, 2021**, Plaintiff shall file a pre-motion letter not to exceed three single-space pages citing the controlling authorities that Plaintiff contends would warrant granting the motion.

The Clerk of Court is respectfully directed to close the motion at Dkt. No. 7.

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

VALMONT, INC.,	:	Civil Action No. 21-cv-7223
	:	
Plaintiff	:	
	:	
-against-	:	
	:	
VF CORPORATION, INC., VFO, INC., and	:	
KONTOOR BRANDS, INC.	:	
	:	
Defendants	:	
	:	

**NOTICE OF MOTION TO REJECT REMOVAL MOTION and/or FOR**  
**TRANSFER BACK TO SUPREME COURT**

PLEASE TAKE NOTICE that Plaintiff, VALMONT, INC. pursuant to Rules 7 and 11 of the FRCP and the motion rules of the Honorable Lorna Schofield, upon the accompanying affidavit of Nicholas Vale; the Declaration of Eleanor Vale, attorney for plaintiff, with exhibits annexed thereto; Memorandum of Law and all prior pleadings heretofore filed by plaintiff's counsel, will move this Court before the Honorable Lorna Schofield., United States District Judge, in the United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, on a date and at a time to be designated by the Court, for an Order: (i) denying VFCorp motion for Removal; (ii) granting plaintiff's motion for allowing case to stay in/or transfer back to Supreme Court; (iii) awarding plaintiff all costs and attorney's fees incurred in connection with the instant action and

this motion; and (iii) granting such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
Sept.1, 2021

Respectfully submitted

/s/ *Eleanor Vale*

Eleanor Vale

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BY EMAIL only

THE HONORABLE NANCY M. BANNON  
Supreme Court of the State of New York  
Index No.: 654048/2021 Filed 6/25/20